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RECREATION VEHICLE
INDUSTRY ASSOCIATION

1896 Preston White Drive, Reston, VA 20191-4363
P.O. Box 2999, Reston, VA 20195-0999
Phone 703/620-6003 Fax 703/620-5071

Facsimile Transmission Cover Sheet

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To: Docket Management

Company: NHTSA Fax: 202-493-2833

From: David Humphreys

Attached are comments submitted by RVIA re; Docket No. NHTSA -- 2002--11419

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Office of the President

May 8, 2002

Docket Management
Room PL---401
400 Seventh Street, SW
Washington, DC 20590-6027

Re: Docket No. NHTSA --2002--11419
National Academy of Science **Study** and Future Fuel Economy
Improvements, Model Years 2005 - 2010

**COMMENTS SUBMITTED BY RECREATION VEHICLE
INDUSTRY ASSOCIATION (RVIA)**

RVIA is a national trade association that represents **the** manufacturers of recreation vehicles (RVs) including custom van, pickup truck, and sport utility conversions ("conversion vehicles"), as well as motorhomes, travel trailers, **fifth** wheel trailers, and truck campers. RVIA's members produce approximately 98 percent of all motorhomes, travel trailers, fifth wheel trailers and truck campers, and over **95** percent of all custom conversion vehicles produced in the United States. A majority of these members are small business entities.

Any increase in the CAFE standard for light trucks on 2005 - 2010 model year vehicles must be reasonable, limited and technologically feasible.

RVIA is very concerned that if fuel economy standards for light **trucks** are significantly increased, consumers will not be able to afford to purchase tow vehicles capable of safely towing camping trailers **such** as travel trailers and fifth wheel trailers. This would be a problem of enormous magnitude for the RV industry **because** it would substantially reduce the sales of new RVs. It would **also** create serious safety problems for **owners** of large camping trailers. The downsizing of passenger automobiles to meet the 27.5 (mpg) Corporate Average Fuel Economy (CAFE) standard forced consumers to turn to light trucks for towing all but the lightest of trailers. Adequate tow vehicles are essential to RV consumers given the trend toward bigger, roomier travel trailers and fifth wheel trailers capable of accommodating the entire family. State legislators have recognized the popularity of these family vehicles and have recently amended existing **laws** to permit the **use** of larger **camping** trailers on public highways. If the **CAFE** requirement on light trucks **is** significantly increased, it will present definite safety hazards to the RV trailer owner as well as others on the roads.

The growing popularity of recreation vehicles with consumers is strong evidence that these vehicles fill specific needs **and** desires. In 2001, nearly 250,000 towable recreation vehicles were produced and **there are now approximately 5** million RV trailers and truck campers currently in **use** in the United States.

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1896 Preston White Dr. P.O. Box 2999 Reston, VA 20195-0999 Tel: 703/620-6003 Fax: 703/620-5071 www.rvia.org

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New safety and emissions features on light trucks including anti-lock brakes, air bags and "Tier I" emissions controls add weight and tend to reduce fuel economy. A significant increase in **CAFE** for light trucks would leave owners of RV trailers with only four possible options, all of which have serious adverse safety consequences.

1. RV owners can retain their older tow vehicle far beyond its expected life.

Not only does this option present obvious safety and environmental hazards, it requires consumers to collectively spend millions of dollars on maintenance and repair costs. Nevertheless, **RVIA** feels this is the most viable option for those who have invested significantly in this chosen lifestyle. However, this option is contrary to the goal of achieving fuel savings, which is the concern that gave rise to this situation. Older, less fuel efficient vehicles pollute more and are not equipped with the latest safety features.

2. RV owners can use lighter weight and under-powered new vehicles.

Use of such vehicles to tow heavy travel trailers or fifth wheel trailers immediately voids the new car warranty attached to these vehicles, thereby creating an additional worry and expense to the consumer. In addition, adverse safety consequences such as inadequate braking power, excessive engine wear, insufficient engine power to accelerate and maintain acceptable speeds in traffic, and reduced stability and maneuverability on the highway warrant serious concern.

3. RV owners can abandon their recreation vehicle trailers.

Given the investment and the substantial financial loss that would result, this is the least practical option for the consumer. Moreover, subsequent purchasers in the used trailer market will in turn adopt one of the other three options.

4. RV owners can purchase larger trucks than they need.

Some RV trailer owners that can no longer hold on to their older tow vehicles may opt to purchase a larger truck than they need -- one that exceeds the regulatory threshold of 8,500 lbs. GVWR and therefore, is beyond the existing **CAFE** restrictions. This choice would force consumers to spend more money on both the vehicle and fuel than they otherwise would have spent. Vehicles above 8,500 lbs. GVWR naturally are not as fuel efficient and therefore this option also has the undesired effect of requiring the consumer to use more fuel. Vehicles above 8,500 lbs. should not be included in the **CAFE** standard.

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It is clear that the above choices will compromise highway safety, the environment and/or fuel economy.

Additionally, **RVIA** is very concerned about CAFE's adverse impact on the future design and towability of RV trailers. The RV industry has in the recent past improved aerodynamic designs of trailers and reduced the size and weight of some of its trailers; by introducing a new class of RV called "light-weight" trailers. However, the industry cannot make people smaller or vacations shorter, or curb consumer demand for comfort and convenience features that contribute significantly to a trailer's size and weight. Therefore, the real-world consumer market prescribes certain minimum size requirements for trailers. If recreation vehicle manufacturers produce trailers that are too small to provide the comfort and convenience features that consumers demand, no one will purchase the units. As a result, many families would be denied low cost vacations while many RV manufacturing employees would be put out of **work**.

Most people must have a **passenger** vehicle in this day and age to meet their daily transportation needs. Consequently, people will purchase an automobile even if they are downsized as a result of **CAFE** standards. A recreation vehicle is not a basic necessity like an automobile. However, it is a product that enhances people's enjoyment of the outdoors and family recreation experiences. If inadequate tow vehicles are available, RV trailer manufacturers will be forced to design smaller, less useful trailers or alternately, use lighter materials that are significantly more expensive, thereby making RV trailers available only to the very wealthy. The price of conversion vehicles would **also** skyrocket as a result of any **CAFE** standard increase. Obviously, this would have a devastating impact on the \$15 billion dollar per year RV industry and consequently cost thousands of jobs.

Conversion trucks, vans, and sport utility vehicles are commonly used by consumers for a multitude of daily tasks. Conversion vans are now in some 3.0 percent of all U. S. households. Forty-two percent of all full-sized van chassis produced are converted by the conversion vehicle industry. These vehicles are widely used to transport entire families, commuters, even little league teams with equipment, thereby eliminating the need of multiple vehicles making multiple trips. Consequently, they are extremely fuel efficient and easier on the environment **when one** considers how they are actually used.

An excessive increase in the **CAFE** standard ~~for~~ light trucks, as well as vans, SUV's and minivans, will result in smaller, lighter, less durable, less useful, less desirable and more expensive designs of these popular conversion vehicles which have essentially replaced station wagons and now serve an important **function** in family lifestyles.

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The Regulatory Flexibility Act of 1980 (Public Law 96-354) requires each agency to evaluate the potential effects of a proposed rule on small business, among others. Most of the manufacturers of conversion vehicles and travel trailers are small business entities. The impact of a significant increase in the CAFE standard would likely be devastating to these small businesses. Existing products would require complete redesign. New lighter, smaller designs would require more exotic materials and sophisticated fabrication processes. Costs to make these changes would be beyond the reach of many small manufacturers. Many such small manufacturers of travel trailers and conversion vehicles would be forced out of business if CAFE standards for light trucks were to be unreasonably increased.

If the CAFE standard for light trucks is irrationally increased, clearly everyone who works in and enjoys the benefits of recreation-oriented industries, including consumers, will suffer. The sad part is that the actual fuel economy savings will be negligible because the likely consumer response, outlined above, would undercut the theoretical fuel savings of higher CAFE standards.

For the reasons set forth herein, RVIA recommends the following:

- Any increase in the CAFE standard for light trucks on 2005 - 2010 model year vehicles must be reasonable, limited and technologically feasible;
- Improvements in engine, transmission and overall vehicle technology should be exhausted prior to any increase in CAFE;
- Increased research on alternative fueled vehicles must take place prior to any increase in CAFE;
- Attribute-based systems should be considered; and
- The maximum vehicle weight rating of vehicles covered by the CAFE standard should remain at 8,500 lbs.

Sincerely,



Daniel J. Humphreys
President